

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO (DAYTON)

IN RE:	*	CASE NO. 19-30822
TAGNETICS INC.	*	CHAPTER 7
INVOLUNTARY DEBTOR	*	

**RESPONSE TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

FROM: Ronald E. Earley

INTERROGATORIES

INTERROGATORY NO. 1

Please state the name, address and substance of the anticipated testimony of any witness you may call at the trial of the Involuntary.

ANSWER: To verify the verbal agreement with me concerning life insurance benefit, history of such payments, and balances due for salary, deferred salary, and unpaid expenses; to verify my adherence to the terms of my employment contract: to verify the history of Tagnetics failure to pay its obligations the following will be called to testify:

Lou Fernandez
4437 Stonehaven Drive
Long Grove, IL 60047

INTERROGATORY NO. 2:

Please state the name, address and substance of the anticipated testimony of any witness who will testify in support of your claim against the Debtor.

ANSWER: Same as no 1

INTERROGATORY NO. 3:

Please state the amounts you assert are owed to you by the Debtor and what facts support the amounts you claim you are owed.

ANSWER: My employment contract and W2 statements show unpaid salary of \$570,313.00 assuming the contract is still in effect 5/31/2019. Determination of balance due for unpaid expenses will require the testimony of Tagnetics' former CFO. It also needs to be stated that my image is still being used by Tagnetics on its PowerShelf website, so I am probably due salary as long as I am being advertised as a member of the team.

2011	\$200,000.00	\$196,153.65	\$3,846.35
2012	\$200,000.00	\$199,999.80	
2013	\$200,000.00	\$200,000.02	
2014	\$200,000.00	\$200,000.06	
2015	\$200,000.00	\$140,461.58	\$59,538.42
2016	\$200,000.00	\$143,558.39	\$56,441.61
2017	\$200,000.00	\$29,000.00	\$171,000.00
2018	\$200,000.00	\$0.00	\$200,000.00
2019	\$200,000.00	\$0.00	\$83,333.00

INTERROGATORY NO. 4:

Please state the name, address and substance of the anticipated testimony of any witness who will testify in support of your assertion that the Debtor is not paying its debts as they come due.

Lou Fernandez
4437 Stonehaven Drive

Long Grove, IL 60047

INTERROGATORY NO. 5:

Please state why you filed the involuntary action against the Debtor, as opposed to filing suit and obtaining a monetary judgment against the Debtor in state or federal court.

ANSWER: The cost of each petitioner filing a suit would have been prohibitive and due to Tagnetics insolvency would have had the same result.

INTERROGATORY NO. 6:

Identify and describe each communication you had with Daniel White or Michael White regarding the Involuntary and/or the Debtor.

ANSWER: I not spoken or communicated to Daniel White or Michael White during either 2017 or 2018.

PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

Copies of all documents that form the basis for your claim against the Debtor.

See attachment DOC1_RE.

REQUEST FOR PRODUCTION NO. 2:

Copies of all correspondence wherein you made a demand on the Debtor for the payment of the amount you assert you are owed by the Debtor.

None, all such demands were verbal.

REQUEST FOR PRODUCTION NO. 3:

Copies of all documents that were used or reviewed by you in the calculation of all claims asserted by you against the Debtor.

See attachment DOC1_RE.

REQUEST FOR PRODUCTION NO. 4:

Copies of all documents used or reviewed that support your assertion that the Debtor is not paying its debts as they become due.

See attachment DOC4

REQUEST FOR PRODUCTION NO. 5:

Copies of all correspondence sent to or received from any other Petitioning Creditor. Since I have been involved in businesses with most of these people for decades, this request is overly broad and impossible to comply with in the time allotted. Recent correspondence has been limited to documents related to this action which are already in your possession.

REQUEST FOR PRODUCTION NO. 6:

Copies of all correspondence with any board member or officer of the Debtor that refers to or relates to or discusses your claim against the Debtor.

None were generated. I was called by several Tagnetics Board Members hassling me to give John White co-CEO of Tagnetics more time to secure funding for a third party source as he had told them he was very close to a deal. They would be Don Sackman and Vincent Browning. They ask for 21 days which was granted by the court so we should now know if he was successful in that fund raising effort.

Also, I have spoken with August Klein several time in the last 6 months asking him to have John White close the Chase Bank account that has my name on it as it is frequently overdraw for long periods of time. No action was taken until after the action was filed.

REQUEST FOR PRODUCTION NO. 7:

Copies of all documents (whether emails, text messages, letters, or other communications) between you and Daniel White or Michael White concerning the Involuntary or the Debtor.

None were generated

Dated: June 3, 2019

Respectfully submitted,

Ronald E Earley
6429 Winding Tree Drive
New Carlisle, OH 45344